

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: <u>July 19, 2007</u>
JEFFREY LEBRON	:	VIOLATIONS:
	:	21 U.S.C. § 846 (conspiracy to possess
	:	with intent to distribute cocaine
	:	- 1 count)
	:	21 U.S.C. § 841(a)(1) and (b)(1)(B)
	:	(possession with intent to distribute
	:	cocaine) - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	21 U.S.C. § 853 Notice of forfeiture

COUNT ONE

conspired and agreed, with “J.R.,” a person known to the grand jury, to knowingly and intentionally possess with the intent to distribute more than 500 grams or more, that is, approximately 999.7 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendant **JEFFREY LEBRON** and “J.R.” agreed to travel to Philadelphia from Lancaster, Pennsylvania to purchase cocaine for resale.

_____ 4. Defendant **JEFFREY LEBRON** and J.R. obtained cocaine in Philadelphia from a supplier to sell to others.

5. Defendant **JEFFREY LEBRON** and J.R. delivered U.S. currency in exchange for the cocaine.

OVERT ACTS

In furtherance of the conspiracy, the defendant and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about November 15, 2006, defendant **JEFFREY LEBRON** and “J.R.” met in Lancaster, Pennsylvania.

2. On or about November 15, 2006, defendant **JEFFREY LEBRON** and J.R. traveled to the vicinity of Lehigh Avenue and Mascher Street in Philadelphia, Pennsylvania.

_____ 3. _____ On or about November 15, 2006, defendant **JEFFREY LEBRON** handed U.S. currency to a person in the vicinity of Lehigh Avenue and Mascher Street in Philadelphia, PA.

4. On or about November 15, 2006, defendant **JEFFREY LEBRON** received approximately one kilogram of cocaine in the vicinity of Lehigh Avenue and Mascher Street in Philadelphia, PA, in exchange for U.S. currency from defendant **LEBRON**.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFREY LEBRON

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with intent to distribute of, 500 grams or more, that is, approximately 999.7 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1) set forth in this indictment, defendant

JEFFREY LEBRON

shall forfeit to the United States under Title 21, United States Code, Section 853:

a. any and all real or personal property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations charged in this indictment; and

b. any and all real or personal property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney